

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION - DAYTON**

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JOHNSON ELECTRIC NORTH  
AMERICA, INC.

Plaintiff/Counter-Defendant,  
v.  
Case No. 3:19-cv-00146-TMR  
Hon. Walter H. Rice  
Hon. Caroline H. Gentry  
HONEYWELL INTERNATIONAL INC.,  
Defendant/Counter-Plaintiff.

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**PLAINTIFF/COUNTER-DEFENDANT JOHNSON ELECTRIC NORTH AMERICA,  
INC.'S MOTION FOR LEAVE TO FILE UNDER SEAL ITS RESPONSE IN  
OPPOSITION TO DEFENDANT/COUNTER-PLAINTIFF HONEYWELL  
INTERNATIONAL INC.'S MOTION FOR LEAVE TO FILE A SURREPLY IN  
OPPOSITION TO JOHNSON ELECTRIC'S MOTION TO ENFORCE COMPLIANCE**

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Pursuant to S.D. Ohio Civ. R. 5.2.1, Plaintiff/Counter-Defendant Johnson Electric North America, Inc., (“Johnson Electric”) requests leave to file Plaintiff/Counter-Defendant Johnson Electric North America, Inc.’s Response in Opposition to Defendant/Counter-Plaintiff Honeywell International Inc.’s Motion for Leave to File a Sur-Reply in Opposition to Johnson Electric’s Motion to Enforce Compliance (“Response”) under seal.

This Response should be filed under seal. Many of the issues in the Response involve confidential, proprietary, and other commercially sensitive information that is not publicly available and should not be publicly available. The parties previously agreed to a Stipulated Protective Order and agreed that the information and documents produced in discovery would involve information deemed to be confidential and the public disclosure of such documents or information would, or likely could, cause harm to the producing party and/or to third parties. (Doc.

No. 44). Further, this Court has previously ordered that filings related to confidential information in this case be filed under seal. (*See e.g.*, Doc. No. 155.)

Based on the foregoing, Johnson Electric requests the Court enter an Order granting its motion for leave to file under seal. A proposed order is attached to this Motion as Exhibit A.

Dated: November 11, 2022

/s/Amanda M. Fielder

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Johnson Electric North America, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on November 11, 2022, I electronically filed the foregoing Plaintiff/Counter-Defendant Johnson Electric North America, Inc.'s Motion for Leave to File Under Seal Its Response In Opposition to Defendant/Counter-Plaintiff Honeywell International Inc.'s Motion for Leave to File a Sur-Reply in Opposition to Johnson Electric's Motion to Enforce Compliance to the Clerk of the Court using ECF System, which sent electronic notification of the filing on the same day and was served upon all counsel of record via the Court's CM/ECF system.

*/s/Amanda M. Fielder*

Amanda M. Fielder